Main Identity

From: "Jim Spalding" <jim_spalding@msn.com>
To: <jrush@rockymountainenvironmental.com>
Cc: <ROD@INDEPENDENTDRILLING.COM>
Sent: Tuesday, September 26, 2006 9:29 AM
Subject: 060926 Well Construction Standards ABANDONMENT

Jim,
I have one driving concern about the negotiated rule making that I need to share with you for possible inclusion into the forthcoming October 6 working draft. This concerns the existing language regarding Well Abandonment beginning on line #540 of the September 22 Working Draft.

First let me say that I understand the driving force behind the language -- protection of the resource. However, I also think that a degree of practicality is required here to help protect the resource rather than impose rules that will likely place the abandonment of wells out of financial reach of the majority of domestic well stakeholders.

What is proposed by the language in the 9/22 version will likely cost upwards of $2,500 per domestic well here in eastern Idaho. The vast majority of domestic well users cannot afford or will not pay these kinds of costs to plug the hole. Consequently, very few holes will actually be plugged thus negating the intent of the rules. Conversely, if current abandonment are only slightly modified more stakeholders will continue to plug the wells and with proper implementation the percentage may likely increase.

Granted the current abandonment rules don't always provide a 100% seal. But if 75% of the wells were abandoned using a "slightly modified" version of the existing rules and the average seal were 75% effective -- this is certainly more practical and palatable than abandonment of 10% of the wells with a 100% effective seal. The first option I think does more to protect the resource than the latter.

The rules need to be practical and financially acceptable to the majority of stakeholders to achieve the aim of protecting the resource.

FOR DOMESTIC, MONITORING AND EXPLORATION WELLS ONLY
Even though I understand the intent and the engineering of the proposed methods, I would rework the language to offer more field practical alternatives and eliminate the demand for perforations and forced injection of seal material. Also, remove the engineering statements regarding the placement and number of perforations required -- they are grossly excessive.

Recognize that pulling casing is, in most instances, impossible from a practical point of view.

Soften the language on line #559 and offer it as an option.

Remove the implied need for the driller to return to the site, with drilling equipment, to abandon the well.

Remove the language that only licensed well drillers can do this work.

I know this is not what you desire, nor do I completely disagree with you, but I think to make the well abandonment concept work -- to at least partially protect the resource -- it has to be field practical and financially within reach of the majority of the stakeholders.

Regards,
Jim Spalding